

**IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

	)	
	)	Chapter 11
	)	
In re:	)	Case No. 22-11068 (JTD)
	)	
FTX TRADING LTD., <i>et al.</i> , <sup>1</sup>	)	(Jointly Administered)
	)	
Debtors.	)	<b><u>Objection Deadline: January 6, 2025 at 4:00 p.m. (ET)</u></b> <sup>2</sup>
	)	<b><u>Hearing Date: March 13, 2025 at 1:00 p.m. (ET)</u></b>
	)	
	)	

**SUPPLEMENT TO THE EIGHTH INTERIM  
FEE APPLICATION OF PAUL HASTINGS LLP**

Paul Hastings LLP (“Paul Hastings”), lead counsel to the Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby supplements (this “Supplement”) the *Eighth Interim Fee Applications for the Professionals of the Official Committee of Unsecured Creditors for the Period from August 1, 2024 Through and Including October 8, 2024* (the “Application”), filed contemporaneously herewith, and requests compensation of fees and reimbursement of costs and expenses incurred for professional services rendered by Paul Hastings during the period from August 1, 2024 through and including October 8, 2024 (the “Application Period”) for or on behalf of the Committee in connection with the Chapter 11 Cases.

<sup>1</sup> The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> The objection deadline set forth herein is for all parties other than the Fee Examiner and the U.S. Trustee (each as defined in the Fee Examiner Order), whose objection deadline shall be governed by that certain *Order (I) Appointing Fee Examiner and (II) Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of Expenses* [Docket No. 834] (the “Fee Examiner Order”).

### **Jurisdiction and Venue**

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the *Appendix B of the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* (the “U.S. Trustee Guidelines”), rules 2016-1 and 2016-3 of the Local Rules of the United States Bankruptcy Court, District of Delaware (the “Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* by order of this Court, dated January 9, 2023 [Docket No. 435].

### **Background**

4. On November 11 and November 14, 2022, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code with this Court. The Debtors continue to operate their businesses and manage their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. As of the date hereof, no trustee has been appointed in the Chapter 11 Cases. No request has been made for the appointment of a trustee in these Chapter 11 Cases.

5. On December 20, 2022, the Committee selected Paul Hastings to serve as its lead counsel in connection with the Debtors’ Chapter 11 Cases.

6. On February 7, 2023, the Court entered the *Order Authorizing and Approving the Retention and Employment of Paul Hastings LLP as Lead Counsel to the Official Committee of*

*Unsecured Creditors, Effective as of December 20, 2022* [D.I. 635] (the “Retention Order”), authorizing the retention and employment of Paul Hastings as lead counsel to the Committee, effective as of December 20, 2022. The Retention Order authorizes Paul Hastings to be compensated for its services at its regular hourly rates in effect from time to time, as such rates may be increased periodically, and reimbursed for any costs and expenses incurred in connection with its representation of the Committee in connection with the Chapter 11 Cases, as set forth therein.

7. On July 3, 2024, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) filed *the Fifth Amended Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 19221].<sup>3</sup>

8. On October 8, 2024 (the “Confirmation Date”), the Court entered the *Findings of Fact, Conclusions of Law and Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [Docket No. 26404] (the “Confirmation Order”), whereby the Court confirmed the *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates* [Docket No. 26029] (the “Plan”). Under section 2.1.162 of the Plan, the fee and expense claims of estate professionals, including Paul Hastings as Committee counsel, extend through the Confirmation Date.

### **Case Status Summary**

9. These Chapter 11 Cases present significant legal issues, many of which are complex and matters of first impression. During the Application Period, the Committee and its advisors

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<sup>3</sup> The notice amended the initial *Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 231] issued by the U.S. Trustee on December 15, 2022, to reflect the addition and correction of contact information for certain of the members of the Committee, and to reflect the resignations of Acaena Amoros Romero, Coincident Capital International, Ltd., GGC International Ltd., Octopus Information, Ltd., Wintermute Asia PTE. Ltd., and Zachary Bruch from the Committee.

have worked to resolve the complex issues in these Chapter 11 Cases and continue to do so as they work to maximize returns for the class of general unsecured creditors. In spite of the complexities of these Chapter 11 Cases, the Committee, with the assistance of its advisors, has accomplished a great deal during the Application Period from both an administrative and operational perspective. For example, during the Application Period and with Paul Hastings' advice and counsel, the Committee has, among other things:

- a) prepared materials and held meetings with members of the Creditors Advisory Committee;
- b) analyzed legal and factual issues regarding objections to the Debtors' plan of reorganization;
- c) drafted and filed a written statement in support of confirmation of the Debtors' plan of reorganization;
- d) prepared for and attended the hearing on confirmation of the Debtors' plan of reorganization;
- e) analyzed legal and factual issues regarding the supplemental report issued by the Examiner;
- f) coordinated with the Debtors regarding drafting of confirmation-related filings;
- g) negotiated with the Debtors and their professionals regarding the Debtors' plan of reorganization, including analyzing issues related to the proposed distribution agents and distribution structures;
- h) analyzed legal and factual issues regarding settlements brought by and against the Debtors' estates;
- i) conducted due diligence, research and analysis with respect to sales of certain of the Debtors' venture and digital assets;
- j) coordinated with the Debtors regarding the reconciliation of claims filed against the Debtors' estates;
- k) participated in meetings with the Debtors and their advisors regarding management of the Debtors' venture assets, and conducted diligence of certain of the Debtors' prepetition venture investments and proposed asset sales; and

- l) analyzed legal and factual issues regarding adversary proceedings filed by and against the Debtors, as well as other adjacent litigation involving the Debtors or their affiliates.

10. Given the Committee's accomplishments during the Application Period, as advised by Paul Hastings, and the complexities of these Chapter 11 Cases, Paul Hastings submits that the compensation and expense reimbursement sought herein for the necessary and beneficial professional services Paul Hastings provided to the Committee during the Application Period are reasonable and appropriate, commensurate with the scale, nature, and complexity of these Chapter 11 Cases, and should be approved.

**Information Required by the Guidelines**

11. Attached hereto as **Exhibit A** through **Exhibit E** are certain schedules requested by the U.S. Trustee Guidelines.<sup>4</sup>

12. Paul Hastings responds to the questions set forth in Paragraph C.5. of the U.S. Trustee Guidelines as follows:

**Question:** Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees, or terms for services pertaining to this engagement that were provided during the Application Period?

**Response:** No.

**Question:** If the fees sought in this application as compared to the fees budgeted for the Application Period are higher by 10% or more, did you discuss the reasons for the variation with the client?

**Response:** Not applicable.

**Question:** Have any of the professionals included in this application varied their hourly rate based on the geographic location of the bankruptcy case?

**Response:** No.

**Question:** Does the application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be

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<sup>4</sup> The Committee and Paul Hastings reserve all rights as to the relevance and substantive legal effect of the U.S. Trustee Guidelines with respect to any application for compensation in the Chapter 11 Cases.

compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

**Response:** Yes. The Application includes approximately 7.0 hours and associated fees of approximately \$6,976.00 related to reviewing or revising time records or invoices for, among other things, ensuring time entries are properly categorized by U.S. Trustee task code and protecting privileged or confidential information, particularly as to the identity of certain litigation, investigation, and asset disposition targets. Pursuant to agreement with the Fee Examiner, Paul Hastings created a coding system whereby certain junior associates and paraprofessionals review the monthly time entries for names of such targets and replace the target name with a code number. While the U.S. Trustee and the Fee Examiner receive the original invoices, Paul Hastings publicly files and serves the coded invoices. The hours and fees above reflect, in part, this process.

**Question:** Does this application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

**Response:** Yes, as set forth above.

**Question:** If the application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rates increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation consistent with ABA Formal Ethics Opinion 11-458?

**Response:** Paul Hastings did not adjust its hourly rates during the Application Period.

13. To the extent that time or disbursement charges for services rendered or disbursements incurred on behalf of the Committee relate to the Application Period, but were not processed before the preparation of, or included in, this Application, or Paul Hastings has for any other reason not sought compensation or reimbursement with respect to such services or expenses, Paul Hastings reserves the right to request compensation for such services, and reimbursement of such expenses, in a supplemental or future application. Also, Paul Hastings does not waive, and expressly reserves, its right to respond to any objections regarding this Application and the amounts sought for Paul Hastings' work in the Chapter 11 Cases.

Dated: December 16, 2024  
New York, New York

**PAUL HASTINGS LLP**

/s/ Erez Gilad

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**EXHIBIT A****CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES**

The blended hourly rate for Paul Hastings' timekeepers in its New York office who billed to non-bankruptcy matters (collectively, the "Non-Bankruptcy Matters")<sup>5</sup> during the twelve-month period beginning on November 1, 2023 and ending on October 31, 2024 was, in the aggregate, approximately \$1,311 per hour. The blended hourly rate for Paul Hastings' timekeepers who billed to the Chapter 11 Cases during the Application Period was approximately \$1,513 per hour. A detailed comparison of these rates follows:

Category of Timekeeper	Blended Hourly Rate	
	Non-Bankruptcy Matters Blended Hourly Rate	Committee Blended Hourly Rate
Partner	\$1,743	\$2,051
Counsel	\$1,561	\$1,590
Associate	\$1,076	\$1,056
Paralegal	\$486	\$565
<b>All Timekeepers Aggregated</b>	<b>\$1,311</b>	<b>\$1,513</b>

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<sup>5</sup> It is the nature of Paul Hastings' practice that certain non-bankruptcy engagements require the advice and counsel of professionals and paraprofessionals who work primarily within Paul Hastings' restructuring group. Accordingly, Non-Bankruptcy Matters consist of matters for which Paul Hastings' timekeepers represented a client in matters other than court-approved engagements as counsel for the debtor, the chapter 11 trustee, or an official committee under the Bankruptcy Code. Thus, the Non-Bankruptcy Matters include, in part, time billed by Paul Hastings' timekeepers who work primarily within Paul Hastings' restructuring group.



**EXHIBIT B****SUMMARY OF TIMEKEEPERS FOR APPLICATION PERIOD**

Name, Position	Year of First Admission, Department	Fees Billed in this Application Period	Hours Billed in this Application Period	Hourly Rate Billed		Number of Rate Increases Since Case Inception <sup>6</sup>
				In this Application	In First Interim Application	
PARTNER						
Gilad, Erez	2001, Financial Restructuring	\$47,040.00	22.40	\$2,100.00	\$1,735.00	3
Hansen, Kris	1996, Financial Restructuring	\$67,160.00	29.20	\$2,300.00	\$1,935.00	3
Kelly, Brian	2001, Financial Restructuring	\$16,698.50	9.10	\$1,835.00	\$1,510.00	3
Merola, Frank	1988, Financial Restructuring	\$56,070.00	26.70	\$2,100.00	\$1,735.00	3
Pasquale, Ken	1990, Financial Restructuring	\$359,940.00	171.40	\$2,100.00	\$1,735.00	3
Sasson, Gabe	2010, Financial Restructuring	\$110,650.50	60.30	\$1,835.00	\$1,510.00	3
Sasson, Gabe (travel, bill at ½ rate)	2010, Financial Restructuring	\$2,752.50	3.00	\$917.50	\$755.00	3
Zuppone, Michael	1989, Securities & Capital Markets	\$5,117.50	2.30	\$2,225.00	N/A	2
Partner Total		\$665,429.00	324.40			
OF COUNSEL						
Greenbacker, Lauren-Kelly D.	2014, Fintech & Payments Group	\$2,544.00	1.60	\$1,590.00	\$1,225.00	4
Sasson, Isaac	2016, Financial Restructuring	\$68,200.00	44.00	\$1,550.00	\$1,200.00	4
Silber, Gary	2011, Tax	\$30,155.00	16.30	\$1,850.00	\$1,490.00	3
Traxler, Katherine A.	1990, Financial Restructuring	\$5,936.00	5.30	\$1,120.00	\$920.00	3
Of Counsel Total		\$106,835.00	67.20			
ASSOCIATE						
Catalano, Kristin	2021, Financial Restructuring	\$13,153.50	11.10	\$1,185.00	\$775.00	3
Fedler, Kayla	2022, Fintech and Payments Group	\$2,462.50	2.50	\$985.00	\$755.00	3
Iaffaldano, Jack	2020, Financial Restructuring	\$55,426.00	42.80	\$1,295.00	\$930.00	3
Koch, Leonie	2023, Financial Restructuring	\$102,735.50	104.30	\$985.00	\$755.00	2
Koch, Leonie (travel, bill at ½ rate)	2023, Financial Restructuring	\$2,610.25	5.30	\$492.50	\$377.50	2

<sup>6</sup> Effective February 14, 2023, August 8, 2023, and January 1, 2024, with Committee approval, Paul Hastings implemented hourly rate adjustments in the Chapter 11 Cases in accordance with the Retention Order [Docket No. 635], the Retention Application [Docket No. 518], the Voorhees Declaration [Docket No. 518], and the Gilad Declaration [Docket No. 518].

Name, Position	Year of First Admission, Department	Fees Billed in this Application Period	Hours Billed in this Application Period	Hourly Rate Billed		Number of Rate Increases Since Case Inception <sup>6</sup>
				In this Application	In First Interim Application	
Miliotes, Lanie	2023, Financial Restructuring	\$12,115.50	12.30	\$985.00	\$755.00	2
Sadler, Tess	2019, Financial Restructuring	\$1,228.50	0.90	\$1,365.00	N/A	1
Wong, Nicole	2023, Tax	\$7,289.00	7.40	\$985.00	N/A	1
Associate Total		\$197,020.75	186.60			
PARAPROFESSIONAL						
Laskowski, Mat	Financial Restructuring	\$56,104.50	99.30	\$565.00	\$515.00	2
Magzamen, Michael	Financial Restructuring	\$169.50	0.30	\$565.00	\$515.00	2
Paraprofessional Total		\$56,274.00	99.60			
TOTAL:		\$1,025,558.75	677.80			
BLENDED HOURLY RATE:		\$1,513				

**EXHIBIT C**

**BUDGET AND STAFFING PLAN FOR APPLICATION PERIOD**

**EXHIBIT C-1****BUDGET****Period Covered:** August 2024

<b>U.S. Trustee Task Code and Project Category</b>		<b>Estimated Hours</b>	<b>Estimated Fees<sup>1</sup></b>	<b>Hours Billed</b>	<b>Amount Billed</b>
B110	Case Administration	34	\$51,442	37.40	\$23,814.50
B112	General Creditor Inquiries	15	\$22,695	13.70	\$25,252.00
B113	Case Analysis/Pleadings Review	15	\$22,695	17.10	\$19,403.00
B115	Meetings and Communications with Debtors	13	\$19,669	11.20	\$20,892.50
B130	Asset Disposition	20	\$30,260	15.30	\$30,696.50
B150	Meetings and Communications with Creditors	15	\$22,695	12.40	\$23,951.00
B155	Court Hearings	1	\$1,513	0.40	\$226.00
B162	Fee/Compensation Matters (Paul Hastings)	27	\$40,851	29.10	\$33,395.50
B166	Fee/Compensation Matters (Other Professionals)	2	\$3,026	1.00	\$2,100.00
B185	Assumption/Rejection of Leases and Contracts	1	\$1,513	0.20	\$420.00
B188	Examiner Matters	4	\$6,052	2.70	\$5,670.00
B191	General Litigation	32	\$48,416	28.70	\$52,567.50
B210	Business Operations	2	\$3,026	1.40	\$1,936.50
B215	Regulatory Matters	4	\$6,052	4.10	\$5,006.50
B261	Investigations	5	\$7,565	3.70	\$6,878.00
B310	Claims Administration and Objection	10	\$15,130	8.10	\$15,573.00
B320	Plan and Disclosure Statement (including Business Plan)	145	\$219,385	131.40	\$237,577.00
<b>TOTAL:</b>		<b>345</b>	<b>\$521,985</b>	<b>317.90</b>	<b>\$505,359.50</b>

<sup>1</sup> The budgeted fees are based on a blended hourly rate of \$1,513 for the Paul Hastings timekeepers expected to work on this matter during the Application Period.

**EXHIBIT C-2****BUDGET****Period Covered:** September 2024

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours</b>	<b>Estimated Fees<sup>1</sup></b>	<b>Hours Billed</b>	<b>Amount Billed</b>
B110 Case Administration	28	\$42,364	30.40	\$17,176.00
B112 General Creditor Inquiries	8	\$12,104	7.70	\$11,541.50
B113 Case Analysis/Pleadings Review	13	\$19,669	13.90	\$15,468.00
B115 Meetings and Communications with Debtors	7	\$10,591	6.20	\$10,615.00
B130 Asset Disposition	10	\$15,130	8.10	\$16,145.50
B150 Meetings and Communications with Creditors	10	\$15,130	9.50	\$15,724.50
B155 Court Hearings	16	\$24,208	17.10	\$18,688.50
B162 Fee/Compensation Matters (Paul Hastings)	9	\$13,617	9.60	\$9,672.00
B175 Bahamian PropCo Analysis	2	\$3,026	1.40	\$2,940.00
B185 Assumption/Rejection of Leases and Contracts	1	\$1,513	0.20	\$420.00
B188 Examiner Matters	8	\$12,104	8.40	\$12,202.00
B191 General Litigation	10	\$15,130	10.70	\$15,064.50
B195 Non-Working Travel <sup>2</sup>	2	\$1,513	2.70	\$1,329.75
B210 Business Operations	1	\$1,513	1.10	\$1,641.00
B211 Financial Reports (Monthly Operating Reports)	1	\$1,513	0.20	\$420.00
B261 Investigations	3	\$4,539	2.20	\$4,620.00
B310 Claims Administration and Objection	10	\$15,130	8.20	\$15,224.50
B320 Plan and Disclosure Statement (including Business Plan)	120	\$181,560	118.30	\$200,155.00
<b>TOTAL:</b>	<b>259</b>	<b>\$390,354</b>	<b>255.90</b>	<b>\$369,047.75</b>

<sup>1</sup> The budgeted fees are based on a blended hourly rate of \$1,513 for the Paul Hastings timekeepers expected to work on this matter during the Application Period.

<sup>2</sup> Paul Hastings charges one-half a timekeeper's customary hourly rate for time incurred for non-working travel.

**EXHIBIT C-3****BUDGET****Period Covered:** October 1- 8, 2024

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours</b>	<b>Estimated Fees<sup>1</sup></b>	<b>Hours Billed</b>	<b>Amount Billed</b>
B110 Case Administration	9	\$13,617	9.30	\$5,464.50
B112 General Creditor Inquiries	5	\$7,565	5.40	\$7,951.00
B113 Case Analysis/Pleadings Review	1	\$1,513	1.10	\$1,083.50
B115 Meetings and Communications with Debtors	2	\$3,026	1.20	\$2,365.50
B130 Asset Disposition	4	\$6,052	2.80	\$5,774.50
B150 Meetings and Communications with Creditors	5	\$7,565	4.00	\$6,770.50
B155 Court Hearings	50	\$75,650	50.00	\$74,591.00
B162 Fee/Compensation Matters (Paul Hastings)	1	\$1,513	1.00	\$985.00
B191 General Litigation	6	\$9,078	6.50	\$8,341.00
B195 Non-Working Travel <sup>2</sup>	6	\$4,539	5.60	\$4,033.00
B320 Plan and Disclosure Statement (including Business Plan)	22	\$33,286	17.10	\$33,792.00
<b>TOTAL:</b>	<b>111</b>	<b>\$163,404</b>	<b>104.00</b>	<b>\$151,151.50</b>

<sup>1</sup> The budgeted fees are based on a blended hourly rate of \$1,513 for the Paul Hastings timekeepers expected to work on this matter during the Application Period.

<sup>2</sup> Paul Hastings charges one-half a timekeeper's customary hourly rate for time incurred for non-working travel.

**EXHIBIT C-4**  
**STAFFING PLAN**

**Period Covered:** August 2024

<b>Category of Timekeeper (using categories maintained by the firm)</b>	<b>Number of Timekeepers Expected to Work on Matter During Budget Period</b>	<b>Anticipated Average Hourly Rate for Budget Period</b>	<b>Actual Number of Timekeepers Who Worked on Matter During Budget Period</b>	<b>Average Hourly Rate for Budget Period</b>
Partner	7	\$2,075	7	\$2,071
Of Counsel	4	\$1,530	4	\$1,528
Associate	7	\$1,115	7	\$1,112
Paraprofessional	2	\$565	2	\$565

**Period Covered:** September 2024

<b>Category of Timekeeper (using categories maintained by the firm)</b>	<b>Number of Timekeepers Expected to Work on Matter During Budget Period</b>	<b>Anticipated Average Hourly Rate for Budget Period</b>	<b>Actual Number of Timekeepers Who Worked on Matter During Budget Period</b>	<b>Average Hourly Rate for Budget Period</b>
Partner	6	\$2,045	6	\$2,045
Of Counsel	3	\$1,510	3	\$1,507
Associate	6	\$1,045	6	\$1,042
Paraprofessional	1	\$565	1	\$565

**Period Covered:** October 1 - 8, 2024

<b>Category of Timekeeper (using categories maintained by the firm)</b>	<b>Number of Timekeepers Expected to Work on Matter During Budget Period</b>	<b>Anticipated Average Hourly Rate for Budget Period</b>	<b>Actual Number of Timekeepers Who Worked on Matter During Budget Period</b>	<b>Average Hourly Rate for Budget Period</b>
Partner	6	\$1,885	6	\$1,884
Of Counsel	2	\$1,700	2	\$1,700
Associate	4	\$1,025	4	\$1,025
Paraprofessional	1	\$565	1	\$565

**EXHIBIT D**

**SUMMARY OF COMPENSATION AND EXPENSE REIMBURSEMENT**  
**FOR APPLICATION PERIOD**



**EXHIBIT D-1**

<b>U.S. Trustee Task Code and Project Category</b>	<b>Hours Billed</b>	<b>Fees Sought</b>
B110 Case Administration	77.10	\$46,455.00
B112 General Creditor Inquiries	26.80	\$44,744.50
B113 Pleadings Review	32.10	\$35,954.50
B115 Meetings and Communications with Debtors	18.60	\$33,873.00
B130 Asset Disposition	26.20	\$52,616.50
B150 Meetings of and Communications with Creditors	25.90	\$46,446.00
B155 Court Hearings	67.50	\$93,505.50
B162 Fee/Compensation Matters (Paul Hastings)	39.70	\$44,052.50
B166 Fee/Compensation Matters (Other Professionals)	1.00	\$2,100.00
B175 Bahamian PropCo Analysis	1.40	\$2,940.00
B185 Assumption/Rejection of Leases and contracts	0.40	\$840.00
B188 Examiner Matters	11.10	\$17,872.00
B191 General Litigation	45.90	\$75,973.00
B195 Non-Working Travel <sup>1</sup>	8.30	\$5,362.75
B210 Business Operations	2.50	\$3,577.50
B211 Financial Reports (Monthly Operating Reports)	0.20	\$420.00
B215 Regulatory Matters	4.10	\$5,006.50
B261 Investigations	5.90	\$11,498.00
B310 Claims Administration and Objections	16.30	\$30,797.50
B320 Plan and Disclosure Statement (including Business Plan)	266.80	\$471,524.00
<b>TOTAL:</b>	<b>677.80</b>	<b>\$1,025,558.75</b>

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<sup>1</sup> Paul Hastings charges one-half a timekeeper's customary hourly rate for time incurred for non-working travel.

**EXHIBIT D-2**

<b>Category</b>	<b>Amount</b>
Computer Search	\$568.41
Court Reporting Services	\$902.50
In-house Color Reproduction Charges (1,443 copies at \$0.50 per page)	\$721.50
Outside Professional Services	\$262,049.82
Travel Expense- Meals	\$32.71
Taxi/Ground Transportation	\$2,669.01
<b>TOTAL:</b>	<b>\$266,943.95</b>

**EXHIBIT E****SUMMARY OF INTERIM FEE APPLICATION SUPPLEMENT**

Name of Applicant	Paul Hastings LLP
Name of Client	Official Committee of Unsecured Creditors
Time period covered by this Application	August 1, 2024 through October 8, 2024
Total compensation sought during the Application Period	\$1,025,558.75
Total expenses sought during the Application Period	\$266,943.95
Petition Date	November 11, 2022 and November 14, 2022
Retention Date	December 20, 2022
Date of order approving employment	February 7, 2023 [Docket No. 635]
Total compensation approved by interim order to date	\$44,120,842.36
Total expenses approved by interim order to date	\$1,488,480.52
Total allowed compensation paid to date pursuant to interim order	\$43,653,511.25
Total allowed expenses paid to date pursuant to interim order	\$1,488,480.52
Blended rate in the Application Period for all attorneys	\$1,676
Blended rate in the Application Period for all timekeepers	\$1,513
Compensation sought for the Application Period already paid pursuant to a monthly compensation order but not yet allowed	\$404,287.64
Expenses sought for the Application Period already paid pursuant to a monthly compensation order but not yet allowed	\$86,040.30
Number of professionals included for the Application Period	18
If applicable, number of professionals for the Application Period not included in staffing plan approved by client	n/a
If applicable, difference between fees budgeted and compensation sought during the Application Period	Budgeted: \$1,075,743.00 Actual: <u>\$1,025,558.75</u> \$50,184.25
Number of professionals billing fewer than 15 hours to the case during the Application Period	9, although the Application Period included only 8 days in October
Are any rates higher than those approved or disclosed at retention?	Yes. Effective February 14, 2023, August 8, 2023, and January 1, 2024, with the Committee's approval, Paul Hastings adjusted its hourly rates in accordance with customary practice, the Retention Order [Docket No. 635], the Retention Application [Docket No. 518], the Voorhees Declaration [Docket No. 536], and the Gilad Declaration [Docket No. 518-3].